

1.0 PCB COMMERCIAL STORAGE INTRODUCTION

The Emerald Transformer Los Angeles, LLC facility is located at 5756 Alba Street in Los Angeles, California. ETLA is a permitted treatment, storage, and disposal facility (TSDF) for hazardous and non-hazardous wastes. The facility receives wastes for storage, consolidation, and shipment to off-site treatment and disposal facilities.

ETLA has occupied its present site since 1979. In 1980, pursuant to new EPA regulations, the facility notified the EPA that it was operating as a transporter of hazardous wastes. At the same time, the facility began planning a waste processing facility. Hazardous waste management applications were filed with the California Department of Health Services (DOHS) in 1984. The DOHS issued the facility a Hazardous Waste Facility Permit on June 3, 1985. The DOHS issued a revised permit on May 29, 1990. This permit was modified twice since that application. The most recent modification was effective February 28, 1995. The facility submitted a RCRA Part B permit re-application to the Department of Toxic Substances Control (DTSC) in November 1994 to renew the existing permit for a period of ten years. Several RCRA permit renewal applications have been submitted to the Department of Toxic Substances Control (DTSC) over the years as updates were necessary. The most recent RCRA permit renewal application was submitted in April 2010 and approved effective January 27, 2011.

The facility was initially authorized to operate as a commercial storage facility for PCBs on September 10, 1991. The initial authorization allowed for the storage of 6,900 pounds of PCB waste. An amendment dated December 19, 1991 revised the maximum storage capacity to 825 gallons and increased the time that PCB items may be stored outside the designated storage area from three business days to six days. A second amendment, dated May 5, 1994, provided interim authorization to use the additional PCB storage area within the Container Storage Warehouse. The use of this area increased the storage capacity to 8,745 gallons.

Under regulations issued by EPA and codified at 40 CFR Part 761.65(d), each Commercial Storer of PCB waste is required to submit an application to the U.S. EPA. This application is submitted pursuant to this requirement for commercial PCB Storage. Accordingly, the facility wishes to store the PCB items, within a designated storage area, prior to shipment off-site for treatment and/or disposal. No TSCA federally regulated PCB treatment or disposal will be performed on-site. The following are examples of items to be managed:

- PCB Transformers
- PCB Capacitors
- PCB Liquids in drums
- PCB Liquids in bulk
- PCB Soils
- Other PCB Solids
- Other PCB Items and Articles

This application is for storage only. No draining of TSCA federally regulated PCBs will be conducted on-site unless the primary container is compromised. In that event PCB liquids will be repackaged using DOT approved containers to ensure environmental integrity and safe off-

site transport. Protocol pertaining to the management/repackaging of a leaking transformer can be found in Appendix H Facility PCB SOP.

Finally, the permitted container storage area will be sampled quarterly, by means of a wipe test, to detect the presence of PCBs and brief hard copy report providing the quarterly wipe sampling results will be submitted to the EPA on an annual basis. The annual analysis report will contain a compilation of the data for all four quarters of wipe sampling for that calendar year. Annual analysis reports will be submitted at the end of the fourth quarter of the calendar year, within 30 days following fourth quarter sampling activities. Additionally, records of the laboratory results for each quarter will be maintained at the Emerald Transformer facility, and will be readily available for EPA inspection.

If, in any given quarter, the PCB concentration in any of the wipe samples exceeds the threshold concentration of $10\mu\text{g}/100\text{cm}^2$, EPA will be promptly notified. A report providing the following information will be sent to EPA:

- Location of sampling
- Dates Samples were collected
- Name of person collecting samples
- Analytical results of the sampling event
- A description of the extent of contamination
- Process used to and clean-up the contaminants

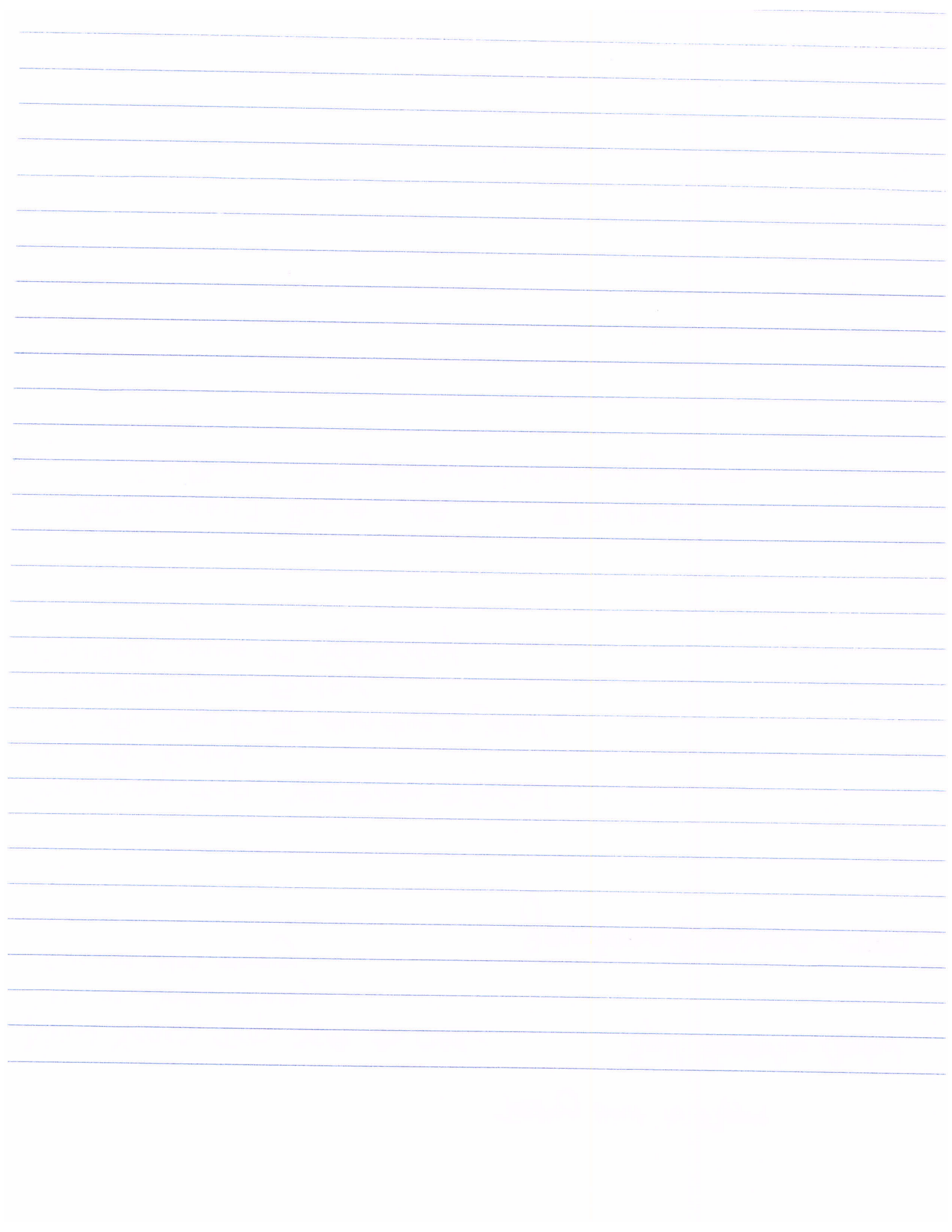
The report will be sent to EPA within 30 days of the sampling event detecting the contamination.

Protocol for collection sampling and management are located in Appendix L.

1.1 Facility Information

Facility Name: Emerald Transformer Los Angeles, LLC

Facility Address: 5756 Alba Street
Los Angeles, CA 90058
EPA ID # CAD050806850



2.0 Facility Owner/Operator Qualifications

2.1 Identification of the Owner, Operator, and Officials of the Facility with Direct Management Responsibilities

Property and Business Operation and Ownership

Building and Land Owner: Emerald Transformer Los Angeles, LLC
5756 Alba Street
Los Angeles, California 90058

Business Owner and Operator: Emerald Transformer Los Angeles, LLC
5756 Alba Street
Los Angeles, California 90058

This facility is one of several operating as part of this corporation. Emerald Transformer Los Angeles, LLC is a member organization of Emerald Transformer Western States, LLC, a Florida corporation, with its headquarters located at:

4509 State Highway 83, PO Box 507
Defuniak Springs, Florida 32435

2.2 Identification of the Person Responsible for Overall Operations of the Facility, and the Supervisory Employees Responsible for Operation of the facility

The key employees responsible for the day-to-day operation of the facility are as follows:

Jason Crawford	Executive V. P. Operations West
Steve Peterson	Facility Manager
Jose Flores	Operations Manager
Jesus Vela	Operations Supervisor

Note: Additional affiliations for Jason Crawford are the Emerald Transformer, LLC locations. These facilities include the following locations two:

Coffeyville, KS
Phoenix, AZ (not a permitted facility)

2.3 Principal Officers

The principal officers of Emerald Transformer Western States, LLC. are:

Corporate Executive Officer:	Stuart Prior
Chief Financial Officer:	Mark Newman
Director of Human Resources:	Meredith Allred
Director of Safety / Environmental Compliance:	Jessica Pennington
Executive V. P. Operations:	Mike Burns
Executive V.P. Operations West:	Jason Crawford
Executive V.P. Product Sales and Marketing:	Shane Willis

2.4 Companies Owned or Operated

Emerald Transformer Los Angeles, LLC is a wholly owned subsidiary of Emerald Transformer Western States, LLC. which does own and operate a number of other companies. The member's officers do not own or operate any other companies. Affiliations of other key operating employees are shown in Section 2.2 and Section 2.7. The parent's officers own and operate all the related subsidiaries and have or have had some ownership interest in numerous other corporate entities. There are no serious environmental violations extant of which the certifying officer(s) are aware in these other corporate entities. The compliance history in Section 5.6 covers the Emerald Transformer Los Angeles, LLC location.

2.5 Technical Qualifications & Experience of Key Employees

Individuals who are directly responsible for the operation of the facility have extensive training in hazardous waste management and/or engineering. The principal individuals who make decisions related to the facility's operations are: the Facility General Manager, the Facility Operations Manager, and the Senior Vice President of Transformer Services. A summary of their qualifications is included. Complete resumes may be found in Appendix A.

Jason Crawford has worked for Emerald Transformer Los Angeles, LLC since June 2017 (former Clean Harbors Los Angeles, LLC from 2015 to 2017). Mr. Crawford's primary responsibilities includes securing short and long-term contracts with utilities and other businesses for the reclamation and disposal of electrical transformers, breakers, high voltage switchgear and other large electrical equipment which also included transportation, storage and disposal of hazardous waste. He also manages a regional sales team responsible for securing and managing accounts as well as backend oil and metals sales into various end user markets. He holds chief P&L responsibilities for the business, which includes five US service facilities located in Los Angeles, CA, Coffeyville, KS, Twinsburg, OH, Tucker, GA and Philadelphia. He also holds chief P&L responsibility for four regional field based business units responsible for substation dismantling operations.

Steve Peterson has been facility General Manager for Emerald Transformer, Los Angeles, LLC since June 2017. Steve has held several positions, including General Manager, for the former Clean Harbors Los Angeles, LLC facility over the past 23 years. Steve possesses a B.S. degree in Chemical Engineering. Steve has also completed a variety of training, which included 40 Hour HAZWOPER, DOT, RCRA, and TSCA Compliance.

Jose Flores has been Operations Manager since June 2017. Mr. Flores has 23 years of industry experience. Jose has held several positions within the former Clean Harbors, Los Angeles, LLC facility, which includes Operations Manager.

Jesus Vela has been an Operations Supervisor since 2002 with the former Clean Harbors Los Angeles, LLC facility. From 1997 to 2002, Mr. Vela was a Treatment Supervisor. Prior to this, Mr. Vela held the position of Chemical Technician since 1987.

2.6 Compliance History

The following compliance history details past State and Federal environmental violations for the Facilities described below.

Emerald Transformer Los Angeles, LLC.

Emerald Transformer Los Angeles, LLC regulatory compliance history for the past five years is summarized in the table below.

Date	Agency	Program	Activity	Findings	Result
04/25/17	DTSC	RCRA	Inspection	<p>DTSC conducted a 3-day inspection. Alleged violations noted:</p> <p>Open container that was holding waste.</p> <p>One transformer was found to be stored in an unpermitted area.</p> <p>Cracks were found in a containment berm.</p> <p>Two containers were found missing hazardous waste labels.</p>	All findings were corrected without penalty.
11/03/16	DTSC	RCRA	Inspection	<p>Alleged violations noted:</p> <p>Storage of hazardous waste in an unpermitted area.</p>	All findings were corrected without penalty.
				Scrap metal	

Date	Agency	Program	Activity	Findings	Result
				leaking oil onto warehouse floor. Cracks found inside of a containment unit. Roll-off dumpster missing hazardous waste label.	
04/28/16	DTSC	RCRA	Inspection	Alleged violation noted: Failure to provide tank assessments for 3 out of service tanks.	Tank assessments for the tanks in question were provided to the DTSC and the violation was removed.
06/26/15	RWQCB	Storm Water	Inspection	Alleged violation noted: Failure to submit Notice of Intent.	The Los Angeles facility has a permit for industrial discharge issued by the City of Los Angeles Bureau of Sanitation. The facility submitted a Non-Exposure Certification to the RWQCB and the

Date	Agency	Program	Activity	Findings	Result
					violation was resolved.
05/12/15	DTSC	RCRA	Inspection	<p>Alleged violation noted:</p> <p>Violation of hazardous waste 10-day transfer rule.</p>	DTSC inspector identified several manifests which were believed to have exceeded 10 days of transfer storage at the facility. The facility was able to demonstrate that none of the manifests were ever transferred through the plant. The violation was removed.
10/21/13	DTSC	RCRA	Inspection	<p>Alleged violations:</p> <p>Violation of hazardous waste 10-day transfer rule.</p> <p>Failure to submit Quarterly Used Oil Report.</p>	DTSC inspector found a transfer tanker truck load that was shipped on its 11 th day. The facility provided an explanation as to why the load was not shipped within 10

Date	Agency	Program	Activity	Findings	Result
					days. A monetary penalty was assessed. The used oil report requested by the Department was provided and the issue was resolved.
02/03/2010	City of Los Angeles	Wastewater	NOV	Sulfide exceedance from 10/26/09 storm water discharge	Closed. No violation.
01/14/2010	CA Air Resources Board	South Coast Air Quality Mgmt District	Inspection	No issues.	No issues.
11/17/2009	City of Los Angeles	Fire Department	NOV	Emergency exit light and alarm panel in need of repair.	Closed. No violations.
07/16/2009	EPA	TSCA	Inspection	No issues.	No issues.
05/15/2009	CA Air Resources Board	South Coast Air Quality Mgmt District	Inspection	No issues.	No issues.
03/24/2009	DTSC	RCRA	Inspection	Annual inspection. Alleged violations : Quantity in isotainer did not match pump record No	Resolved. No violations.

Date	Agency	Program	Activity	Findings	Result
				written procedure for annual tank integrity inspection Malfunction not recorded in the inspection log.	
03/24/200907/16/2009	DTSCEP A	RCRA/TSC A	Inspection / Inspection	Annual inspection. Alleged violations : Quantity in isotainer did not match pump record No written procedure for annual tank integrity inspection Malfunction not recorded in the inspection log. No issues.	Resolved. No violations. No issues.
05/15/2009	CA Air Resources Board	South Coast Air Quality Mgmt District	Inspection	No issues.	No issues.
03/24/2009	DTSC	RCRA	Inspection	Annual inspection. Alleged violations	Resolved. No violations.

Date	Agency	Program	Activity	Findings	Result
				<p>Quantity in isotainer did not match pump record</p> <p>No written procedure for annual tank integrity inspection</p> <p>Malfunction not recorded in the inspection log.</p>	

Emerald Transformer, LLC (formerly Clean Harbors PPM, LLC)

Emerald Transformer, LLC regulatory compliance history for the past five years is summarized below.

This corporate entity has five locations as follows:

- The operation at Ashtabula, OH has had one notice of non-compliance within the last five years that was corrected and no further action was taken.
- The operations in Coffeyville, KS has had one notice of non-compliance within the last five years that was corrected and no further action was taken.
- The Philadelphia, PA facility has had one notices of violation within the last five years that was corrected and no further action was taken.
- The Tucker, GA has had one notice of violation within the last five years which resulted in a penalty. All violations were corrected.
- Twinsburg, OH has had had one notice of non-compliance within the last five years that was corrected and no further action was taken.

Emerald Transformer Western States, LLC

The complete environmental history on the corporate entity may be submitted as requested.

2.7 Affiliation Listing

Other companies currently owned or operated in the past five years by the principals or key employees directly or indirectly involved with waste handling activities:

Ashtabula, OH
Coffeyville, KS
Philadelphia, PA
Tucker, GA
Twinsburg, OH
Defuniak Springs, FL
Nabb, IN
Lexington, MS
Phoenix, AZ